

1 Ashley Richardson  
2 25399 Markham Ln,  
3 Corral De Tierra, CA 93908  
4 (310) 490-2476 |

5 [ashrichardson@mac.com](mailto:ashrichardson@mac.com)

FILED
CLERK, U.S. DISTRICT COURT
10/15/2025
CENTRAL DISTRICT OF CALIFORNIA
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6 IN PRO PER  
7 UNITED STATES DISTRICT COURT  
8 CENTRAL DISTRICT OF CALIFORNIA  
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11 TAYLOR THOMSON,

12 Plaintiff and Counterclaim

13 Defendant

14 vs.

15 ASHLEY RICHARDSON,

16 Defendant and Counterclaim

17 Plaintiff

Case No.: 2:23-cv-04669-MEMF-MAR

DECLARATION OF ASHLEY  
RICHARDSON IN SUPPORT OF  
OPPOSITION TO PLAINTIFF'S EX PARTE  
APPLICATION

21 **DECLARATION OF ASHLEY RICHARDSON IN SUPPORT IN SUPPORT OF**  
22 **OPPOSITION TO PLAINTIFF'S EX PARTE APPLICATION**

25 I, Ashley Richardson, declare:

28 DECLARATION OF ASHLEY RICHARDSON IN SUPPORT OF OPPOSITION TO PLAINTIFF'S EX PARTE  
APPLICATION -

1. I am the Defendant, proceeding pro se. I make this declaration based on personal knowledge.
2. On October 10, 2025, the Magistrate Judge granted both sides' motions to compel and ordered us to meet and confer in good faith to determine mutually agreeable dates and locations for the depositions, while denying any request to extend the discovery cut-off.
3. On October 13–14, I told Plaintiff I would be deposed immediately, including on October 14 or 15, and I asked Plaintiff to provide near-term dates for Ms. Thomson so we could schedule both depositions as the Court ordered. I also agreed to a limited extension if we could agree on setting both depositions before the end of October. Plaintiff refused to provide dates and instead said it would move ex parte to extend deadlines. See Plaintiff's Exhibit A email chain attached to its application.
4. For over a year, I have sought Ms. Thomson's deposition. Plaintiff has repeatedly avoided providing dates, which is why I moved to compel. The Magistrate Judge granted my motion on October 10.
5. I remain ready to sit promptly and to complete both depositions in the next two weeks at a reasonable Central District location.

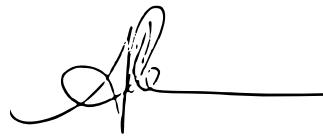
I declare under penalty of perjury that the foregoing is true and correct. Executed October 15, 2025, in Monterey California.

Respectfully submitted,

Ashley Richardson

**DECLARATION OF ASHLEY RICHARDSON IN SUPPORT OF OPPOSITION TO PLAINTIFF'S EX PARTE APPLICATION -**

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5 Dated October 15, 2025.



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7 Ashley Richardson

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28 DECLARATION OF ASHLEY RICHARDSON IN SUPPORT OF OPPOSITION TO PLAINTIFF'S EX PARTE  
APPLICATION -

## **PROOF OF ELECTRONIC SERVICE**

On October 15, 2025, I served the documents described as:

## Plaintiffs opposition to motion to dismiss

on all interested parties in this action by emailing a true and correct copy

thereof addressed to:

Jeff Topor

Kristina.Hovsepyan@wbd-us.com

[Jeff.Topor@wbd-us.com](mailto:Jeff.Topor@wbd-us.com)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 15, 2025 at Los Angeles, CA.

Marley West

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